

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>REID VAN NESS,</b>	)	<b>CASE NO. 3:24-CV-1353</b>
<b>PLAINTIFF,</b>	)	<b>JURY OF 12 DEMANDED</b>
	)	
<b>V.</b>	)	<b>JUDGE CRENSHAW</b>
	)	<b>MAGISTRATE FRENSLEY</b>
<b>TENNESSEE BOARD OF FUNERAL</b>	)	
<b>DIRECTORS AND EMBALMERS, ET AL.,</b>	)	
<b>DEFENDANTS.</b>	)	

**REID VAN NESS' WITNESS AND EXHIBIT LIST  
FOR THE PRELIMINARY INJUNCTION HEARING**

Plaintiff Reid Van Ness, by and through counsel, provide the following witness and exhibit list:

**WITNESSES**

The Plaintiff may call the following witnesses at the hearing:

1.     **Reid Van Ness.**   Mr. Van Ness is a formerly licensed Funeral Director and Embalmer. He will testify concerning his religious and speech activities related to assisting his friends, family members, co-parishioners and neighbors during the difficult times of a loved ones' death. He will further testify as to his ongoing intent to continuing helping people and the real and persistent fear that he will be prosecuted, fined and/or arrested while engaging in the religious rites surround death.

2.     **Shonda Renne Price-Jennings.**   Mrs. Jennings is the wife of decedent Porter Ray Jennings and hold of the "right of disposition" to dictate the funeral arrangements for her husband who died on February 7, 2025. Mrs. Jenning will tearfully testify as to her and her

husband decades long friendship with Mr. Van Ness, and her 87-year old husband's regularly expressed wish Mr. Van Ness assist her with and handle his funeral arrangements in the event of his death. She will further testify how she is great indebted to Mr. Van Ness for his support and kindness and that he generously provided assistance without charge.

3. **Robert Gribble:** Mr. Gribble is the Executive Director for the Board of Funeral Directors and Embalmers. He will testify concerning his and the Board's continuing efforts to threaten and intimidate Mr. Van Ness to prevent him from helping his friends, family members, co-parishioners and neighbors during the difficult times of a loved one's death.

4. Any Witness called by Defendants.

### **EXHIBITS**

- 1 June 21, 2022, letter from Troy Bryant (also on the State's List)
- 2 Minutes, November 14, 2023, Funeral Board
- 3 Minutes, December 12, 2023, Funeral Board
- 4 Minutes, August 11, 2020, Funeral Board
- 5 Minutes, January 2025, Funeral Board
- 6 August 9 & 10, 2022, emails between Bryant and Roberts
- 7 Reid Van Ness CORE printout produced by Robert Gribble
- 8 December 9, 2024, email from the Administrative Procedures Division to Attorney Roberts Concerning Public Records Request
- 9 July 2024, emails between Bryant and Roberts
- 10 June 23, 2022, Letter from Troy Bryant to Charles King
- 11 The Funeral Board Discovery Responses. (Request for Interrogatories, Request for Production and Request for Admissions, and any supplement).

- 12 Deposition transcripts of Troy Bryant
- 13 Deposition transcripts of Robert Gribble
- 14 Deposition transcripts of Reid Van Ness
- 15 Any Exhibit contained in Defendant's Witness and Exhibit List or presented at trial.

Respectfully submitted:

/s/ James D.R. Roberts, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of Plaintiff's Witness and Exhibit List has been sent by the Court's Electronic Filing System to:

Andrew Grams

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On this the 8<sup>th</sup> day of May 2025.

/s/ James D.R. Roberts, Jr.

James Roberts